

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NAPLETON'S ARLINGTON HEIGHTS  
MOTORS, INC. f/k/a NAPLETON'S  
PALATINE MOTORS, INC. d/b/a  
NAPLETON'S ARLINGTON HEIGHTS  
CHRYSLER DODGE JEEP RAM, an  
Illinois corporation; NAPLETON'S RIVER  
OAKS MOTORS, INC. d/b/a NAPLETON'S  
RIVER OAKS CHRYSLER DODGE JEEP  
RAM, an Illinois corporation; CLERMONT  
MOTORS, LLC d/b/a NAPLETON'S  
CLERMONT CHRYSLER DODGE JEEP  
RAM, an Illinois limited liability company;  
NAPLETON'S NORTH PALM AUTO  
PARK, INC. d/b/a NAPLETON'S  
NORTHLAKE CHRYSLER DODGE JEEP  
RAM, an Illinois corporation; NAPLETON  
ENTERPRISES, LLC d/b/a NAPLETON'S  
SOUTH ORLANDO CHRYSLER DODGE  
JEEP RAM, an Illinois limited liability  
company; NAPLETON'S MID RIVERS  
MOTORS, INC. d/b/a NAPLETON'S MID  
RIVERS CHRYSLER DODGE JEEP RAM,  
an Illinois corporation; NAPLETON'S  
ELLWOOD MOTORS, INC. d/b/a  
NAPLETON'S ELLWOOD CHRYSLER  
DODGE JEEP RAM, an Illinois corporation,

Plaintiffs,

v.

FCA US LLC, a Delaware corporation,

Defendant.

Case No. 1:16-cv-00403-VMK-SMF

**JOINT STIPULATION REGARDING PROTECTED DOCUMENTS**

IT IS HEREBY STIPULATED AND AGREED, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, by and among the parties hereto, through their undersigned counsel, that the following provisions shall govern the use of unredacted versions of the documents at FCA\_Napleton\_00037499-664 and FCA\_Napleton\_00069007-34 (to be reproduced in unredacted form at FCA\_Napleton\_00089330-523).

1. Plaintiffs will not show unredacted versions or disclose the redacted content of the aforementioned documents during any deposition, including any deposition of any employee of FCA US LLC (“FCA”), without providing advance notice of at least four (4) business days to counsel for FCA.

2. The treatment of these documents is otherwise governed by the terms of the Agreed Confidentiality Order (Dkt. 88) (“ACO”). Other than as provided in paragraph 1 of this Joint Stipulation, the obligations of the parties under the ACO with regard to the aforementioned documents are unchanged.

3. By entering into this stipulation, Plaintiffs do not agree that FCA’s confidentiality designations are proper, and Plaintiffs reserve their rights to challenge those designations at a later time as needed. But Plaintiffs will treat the documents according to FCA’s current designations until the Court may order otherwise.

Dated: January 30, 2018

Respectfully submitted,

FCA US LLC

The Napleton Plaintiffs

By: /s/ Robert D. Cultice  
Of Counsel:

By: /s/ Jeannie Y. Evans

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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be served upon counsel for Plaintiffs electronically via the CM/ECF system on January 30, 2018.

/s/ Robert D. Cultice